

REMARKS

Claims 1-88 are pending. Claims 1, 11, 20, 30, 39, 40, 49, 58, 68, 77 and 81-84 are amended for clarifications purposes without prejudice or disclaimer. No new matter is added. Reconsideration in view of the following remarks is respectfully requested.

The Communication objects to paragraph 0001 of the specification as lacking a requisite Application Serial Number and to paragraph 0129 as drawn to the future. Applicants respectfully traverse these objections.

Paragraph 0001 of the Specification recites Attorney Docket No. D/A3052, entitled "SYSTEMS AND METHODS FOR NEW EVENT DETECTION" by F. Chen et al., filed July 25, 2003, as U.S. Patent Application Serial No. 10/626,856. Applicants therefore request the withdrawal of the objection to paragraph 0001.

Paragraph 0129 indicates various other types of communication links that can also be used in the practice of this invention. The types of communications links are definite and predictable in that they connect devices and facilitate communication. Applicants therefore respectfully request the withdrawal of the objection to paragraph 0129.

The Communication rejects claims 1, 20, 39, 58, and 81-84 on the grounds of non-statutory obviousness-type double patenting over claims 1, 16 and 31-32 of co-pending Application No. 10/626,856. This rejection is respectfully traversed.

The Communication at page 3, paragraph 6, lines 3-9 asserts that "both claim 1 of the instant application and claim 1 of Application 10/626,856 state the same thing". Applicants respectfully submit that the instant Application 10/626,875 is entitled "Systems and Methods for Linked Event Detection" and claim 1 clearly recites "indicating a link

between other story-pairs based on the predictive model and the inter-story similarity vector”.

In contrast, Application 10/626,856 is entitled “Systems and Methods for New Event Detection” and recites “determining a new story event indicator if the event associated with the new story is similar to the events associated with the source-identified story corpus based on the inter-story similarity metrics and the adjustments. Thus, it is quite clear that the claims of the two different applications are patentably distinct and not obvious with respect to each other. Similar differences are noted with respect to claims 20, 39, 58, and 81-84 of the instant Application. Applicants therefore respectfully request the withdrawal of the non-statutory obviousness-type double patenting rejection of claims 1, 20, 39, 58 and 81-84.

The Communication rejects claims 11, 30, 49 and 68 under 35 U.S.C. § 112, 2nd. This rejection is respectfully traversed.

Claim 11 recites the “[t]he method of claim 2, wherein the inter-story similarity metrics are based on terms in at least one source-identified term frequency-inverse story frequency models.” Antecedent basis is provided by claim 2. Claims 30, 49 and 68 depend from claims 21, 40 and 59 which also provide antecedent basis. Applicants therefore respectfully request the withdrawal of the 35 U.S.C. § 112, 2nd rejection of claims 11, 30, 49 and 68.

The Communication rejects claims 1, 20, 39, 58, 77 and 81-84 under 35 U.S.C. § 101. This rejection is respectfully traversed.

Independent claims 1, 20, 39, 58 and 81-84 recite indicating detected links. Thus, these claims indicate a useful result and are statutory. Independent claim 77 recites features directed to “identifying and transforming transformation errors in other transformed source-

identified texts based on the source-specific transformation actions”.

Thus, independent claim 77 is directed to statutory subject matter.

Claims 82 and 84 are directed to “computer readable storage medium” and are therefore also directed to statutory subject matter. Applicants therefore request the withdrawal of the 35 U.S.C. § 101 rejection of claims 1, 20, 39, 77 and 81-84.

The Communication rejects claims 1-5, 9-10, 14-24, 28-29, 33-43, 47-48, 52-62, 66-67, 71-76, and 81-88 under 35 U.S.C. § 102(e) over U.S. Patent No. 6,606,620 (hereafter “Sundaresan”). This rejection is respectfully traversed.

Applicants respectfully submit that Sundaresan does not disclose, teach or even suggest at least the features directed to: 1) determining source-identified training stories; and 2) determining inter-story similarity vectors for at least one story-pair, as recited in independent claim 1 and similarly recited in independent claims 20, 39, 58 and 81-84.

In contrast, Sundaresan describes how “for classification of semi-structured documents, the class, is chosen that has the most similar terms distribution to the term distribution of the test document. The term distribution is the distribution of the augmented terms.” (See for example, Sundaresan , col. 4, lines 23-24)

Thus, independent claims 1, 20, 39, 58 and 81-84 define patentable subject matter over Sundaresan. Dependent claims 2-5, 9-10, 14-19 21-24, 28-29, 33-38, 40-43, 47-48, 52-57, 59-62, 66-67, 71-76, and 86-88 depend from claims 1, 20, 39, and 58 and therefore define patentable subject matter for at least the same reasons. Applicants therefore request withdrawal of the rejection of claims 1-5, 9-10, 14-24, 28-29, 33-43, 47-48, 52-62, 66-67, 71-76, and 81-88 under 35 U.S.C. § 102(e).

The Communication rejects claims 77-80 under 35 U.S.C. § 102(a) over “Dynamic Stopwording for Story Link Detection” (hereafter “Brown”). This rejection is respectfully traversed.

Applicants respectfully submit that Brown does not disclose, teach or even suggest at least the features directed to 1) determining a verified first transformation of the source-identified training corpus text from a first source mode to a second source mode; 2) determining an un-verified second transformation of the source-identified training corpus text from a first source mode to a second source mode, as recited in independent claim 77.

In contrast, Brown, at for example, page 1, col. 2, lines 30-38 describes a single pass incremental clustering method. There is no disclosure, teaching or even suggestion anywhere else in Brown of at least the features of independent claim 77 cited above. Thus, claim 77 defines patentable subject matter over Brown. Claims 78-80 depend from claim 77 and therefore define patentable subject matter over Brown for at least the same reasons. Thus, Applicants respectfully request the withdrawal of the 35 U.S.C. § 102(a) rejection of claims 77-80.

The Communication rejects claims 6-8, 25-27, 44-46, and 63-65 under 35 U.S.C. § 103(a) over Sundaresan in view of U.S. Patent Application No. 2004/0006559A1 (hereafter “Gange”). This rejection is respectfully traversed.

The Communication admits that Sundaresan does not disclose at least the features directed to: “wherein the inter-story similarity metric is at least one of a probability based similarity metric and a Euclidean based similarity metric” as recited in dependent claim 6. Applicants agree. The Communication attempts to cure these admitted deficiencies by combining Sundaresan with Gange.

However, even the asserted Sundaresan-Gange combination fails to disclose, teach or even suggest at least the features directed to: 1) determining source-identified training stories; and 2) determining inter-story similarity vectors for at least one story-pair, as recited in the parent independent claim 1 and similarly recited in parent independent claims 20, 39 and 58 from which claims 6-8, 265-27, 44-46 and 63-65 depend.

Ganges describes system, apparatus and method for user tunable and selectable searching of a database wherein the data contained therein have associated descriptive properties capable of being expressed in numeric form. (See for example, Ganges, Abstract, line 1). Thus, Ganges is silent with respect to the features of: 1) determining source identified training stories; and 2) determining inter-story similarity vectors for at least one story-pair. Thus, claims 1, 20, 39 and 58 define patentable subject matter over Sundaresan, alone or in combination with Ganges. Dependent claims 6-8, 25-27, 44-46, and 63-65 depend from claims 1, 20, 39 and 58 and therefore define patentable subject matter for at least the same reasons. Thus, Applicants respectfully request the withdrawal of the 35 U.S.C. § 103(a) rejection of claims 6-8, 25-27, 44-46, and 63-65.

The Communication rejects claims 11-13, 30-32, 49-51 and 68-70 under 35 U.S.C. § 103(a) over Sundaresan in view of U.S. Patent Application No. 2004/0002849A1 (hereafter "Zhou"). This rejection is respectfully traversed.

The Communication admits that Sundaresan does not disclose at least the features directed to: wherein the inter-story similarity metrics are based on terms in at least one source-identified term frequency-inverse story frequency models, as recited in independent claim 11 and similarly recited in dependent claims 30, 49, and 68. Applicants agree.

The Communication attempts to cure these admitted deficiencies by combining Sundaresan with Zhou. However, Zhou fails to remedy either the deficiencies of Sundaresan noted above nor the deficiencies noted with respect to dependent claims 11, 30, 49 and 68.

Zhou discloses selecting sentences using a weighted term frequency-inverse document frequency approach; and ranking the candidate sentences by weighted editing distance. (See for example, Zhou, page 3, col. 2, paragraph 30, lines 8-12.) In Zhou, documents are example sentences. (See for example, Zhou, page 4, col. 1, paragraph 035, lines 1-3.) Applicants submit that the asserted Sundaresan-Zhou combination fails to address all the recited features of claims 11, 30, 49 and 68. Dependent claims 12-13, 31-32, 50-51 and 69-70 define patentable subject matter for at least the same reasons. Thus, Applicants respectfully request the withdrawal of the rejection of claims 11-13, 30-32, 49-51 and 68-70 under 35 U.S.C. § 103(a).

Applicants' respectfully submit this application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited. However, should the Examiner believe anything further is desirable in order to place this application in even better condition for allowance; the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



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Application No. 10/626,875
Amd. dated June 8, 2006
Reply to March 8, 2006 Communication

Docket No. D/A3053-311291

Date: June 8, 2006

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